

Message

From: Toffel, Melissa [Toffel.Melissa@epa.gov]
Sent: 5/10/2019 12:25:29 PM
To: Tim Miller [tmiller@nationalpremiumbeer.com]
CC: Ramalho, Louis [Ramalho.Louis@epa.gov]
Subject: Easton Point - EPA Follow-Up to our Conf Call on 5/9/19
Attachments: Tank RD table _0519_.docx

Mr. Miller,

Thanks for speaking with Louis Ramalho and myself on the conference call yesterday. As promised, here is a summary of the violations and windows of time that we are looking for information. As discussed, please provide any documentation you may have by Friday, May 24th. If you have any questions about what is being asked for, please call me at the number below.

Violations:

I – Tank Release Detection

- Please see the attached table I made with all the records that you have provided me thus far. Please fill in any gaps by sending me any additional records you have. To see that you are currently in compliance we are asking for records up to the present.

II and III – Piping Release Detection

- For Tanks 1 and 3, please provide any Line Leak Detector and Line Tightness Testing that may have been conducted from 8/1/16 (when you resumed operating the site) – 3/23/18 (test provided)
- For Tanks 2, 4 and 5, please provide any Line Leak Detector and Line Tightness Testing that may have been conducted from 6/27/17 (test due) – 3/23/18 (test provided)

IV and V – Failure to Report/Investigate a Release

- For Tank 3, you provided Veeder-Root tank release detection records that show that the tank received Fail results on 2/20/17 and 2/27/17. If you have any documentation to provide to show that you initiated an investigation into the cause of the fails (i.e. emails to a contractor, contractor invoices, etc.), please provide that to me.

VI – Failure to test the Cathodic Protection System

- If the cathodic protection system had any testing done between 6/17/17 (when a test was due) until 2/1/18 (system tested), please provide that documentation to me.

*Melissa Toffel, U.S. EPA Region III
Enforcement & Compliance Assurance Division
Air, RCRA & Toxics Branch
1650 Arch Street (Mail Code 3ED22)
Philadelphia, PA 19103
P: 215-814-2060
F: 215-814-3163*

